

## Horizon Therapeutics plc Global Policy on Human Rights

At Horizon, doing the right thing is infused in every facet of our work – how we advocate for patients, how we work with healthcare providers, how we treat each other, how we make decisions and how we operate with integrity. Above all, doing the right thing is our north star and at the very core of who we are.

We demonstrate this commitment via this Global Policy on Human Rights and the policies included in our [Code of Conduct & Ethics](#) (“the Code”). This Global Policy on Human Rights applies to all Horizon employees and any individuals representing the company (collectively “employees”). We expect all our employees to align in the promotion of the values of fair treatment, dignity and respect, and to adhere to laws concerning human rights within all countries of operation. We are committed to conducting our business in adherence to the human rights standards listed below (“The Human Rights Standards”).

### The Human Rights Standards

The Human Rights Standards that we expect Horizon employees to observe include, but are not limited to, the following principles:

#### 1. Freely chosen employment

- a. Not to derive labor from human trafficking, bonded labor, slavery or prison labor.
- b. Not to employ children below the applicable legal age for employment nor to employ minors in hazardous work, regardless of the legal age for employment.

#### 2. Non-discrimination

- a. To maintain a work environment free of discrimination.
- b. Not to discriminate on the basis of race, color, national origin, religion, age, sex, gender identity, sexual orientation or (physical or mental) disability or any other characteristic protected by applicable law.
- c. To foster business practices that reflect a commitment to increasing diversity in recruitment, hiring and promotion practices.

#### 3. Fair treatment

- a. To maintain a work environment free of harassment (including sexual harassment), abuse, corporal punishment, coercion or intimidation.

#### 4. Compensation

- a. To compensate employees and contractors in compliance with minimum wage, overtime and mandated benefit laws in the country of employment. Compensation should also be properly documented and recorded. We are committed to gender and ethnicity pay equity.
- b. Not to permit employees’ work hours to exceed limitations provided by applicable local laws or regulations.

#### 5. Freedom of Association

- a. To respect the right of employees to join or form groups for representation as permitted by the applicable national laws in the countries of operation.

Horizon is committed to upholding internationally recognized human rights standards and adhering to all laws concerning human rights within all countries of operation.

These Human Rights Standards are also incorporated into Horizon’s Supplier Code of Conduct for the third-party suppliers we work with.

### **Compliance Hotline**

Horizon is committed to an environment where open, honest communications are the expectation, not the exception. We want our employees to feel comfortable in approaching their supervisor or management in instances where the employee believes violations of policies or standards have occurred.

The Ethics Line, an independent toll-free compliance hotline hosted by a third-party provider, is available to employees, contractors and non-employees who prefer to place an anonymous report in confidence. The Ethics Line can be accessed anonymously, either [online](#) or by telephone. Whether callers identify themselves or remain anonymous, any contact with the Ethics Line will be kept strictly confidential to the extent reasonably possible within the objectives of this policy.

To contact the Ethics Line:

- *Online:* [www.horizontherapeutics.ethicspoint.com](http://www.horizontherapeutics.ethicspoint.com)
- *U.S. Horizon Ethics Line:* (866) 320-4277
- *Refer to the Ethics Line website for country-specific access codes for outside the United States*

Additional information on the Ethics Line webpage is accessible through the “Whistleblower” page in the Corporate Governance section of Horizon’s website. (See also “References” at the end of this policy.)

### **Compliance Oversight**

The Nominating and Corporate Governance Committee of the Horizon Board of Directors has responsibility for oversight of this policy. Management periodically reports to the Nominating and Corporate Governance Committee regarding the implementation of, and compliance with, this policy. If necessary, the Nominating and Corporate Governance Committee may oversee the investigation of any reported violation of this policy.

### **Reporting and Investigations**

The Code outlines the procedure for reporting violations or concerns on any ethics matters. We encourage employees to raise concerns and be alert to possible violations and report them without fear of retaliation.

### **Compliance Training Program**

In addition to training on this Human Rights policy, employees undergo training on the Code, which covers key human rights-related principles, including but not limited to anti-harassment, anti-discrimination, privacy, employee safety and compliance. Training on the Code is also conducted as part of employees’ onboarding orientation at initial hire and repeated every two years thereafter. Supplemental training is provided as needed.

### References:

- [Horizon Code of Conduct & Ethics](https://ir.horizontherapeutics.com/static-files/d0a502f3-aacf-42e4-b2a9-b575fd650e37#:~:text=We%20will%20not%20buy%20business,to%20HCP%20and%20HCO%20engagement): <https://ir.horizontherapeutics.com/static-files/d0a502f3-aacf-42e4-b2a9-b575fd650e37#:~:text=We%20will%20not%20buy%20business,to%20HCP%20and%20HCO%20engagement>
- [Ethics Line](https://horizontherapeutics.ethicspoint.com), Horizon's Whistleblower Hotline: <https://horizontherapeutics.ethicspoint.com>
- [Our Commitment to Anti-Racism](https://www.horizontherapeutics.com/media-center/horizon-resources/anti-racism): <https://www.horizontherapeutics.com/media-center/horizon-resources/anti-racism>
- [Our Commitment to Pay Equity](https://www.horizontherapeutics.com/media-center/horizon-resources/pay-equity): <https://www.horizontherapeutics.com/media-center/horizon-resources/pay-equity>